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Attorneys for Consolidated Plaintiff TikTok Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

I, Rob Cameron, under penalty of perjury, hereby declare as follows:

1. I am a shareholder of the law firm of Jackson Murdo & Grant PC, counsel for Consolidated Plaintiff TikTok Inc. (“Plaintiff”) in this matter. I am a member of the bar of the State of Montana as well as this Court. I submit this declaration in support of Plaintiff’s Motion for Preliminary Injunction to place before the Court documents and information necessary for determination of Plaintiff’s motion.

2. Attached as Exhibit A is a true and correct copy of An Act Banning TikTok in Montana, SB 419, which was signed into law on May 17, 2023.

3. Attached as Exhibit B is a true and correct copy of a certified transcript of a March 28, 2023 hearing on SB 419 before the Montana House of Representatives Judiciary Committee.

4. Attached as Exhibit C is a true and correct copy of a certified transcript of an April 13, 2023 Floor Session of the Montana House of Representatives regarding SB 419.

5. Attached as Exhibit D is a true and correct copy of an article titled “Montana Gov Seeks to Expand TikTok Ban to Other Social Apps,” which was written by Haleluya Hadero and published by the *Associated Press* on April 26, 2023. The article is available at <https://apnews.com/article/tiktok-ban-montana-bytedance-b735350b367c3f3a0076eaf1267dab18> (last accessed July 5, 2023).

6. Attached as Exhibit E is a true and correct copy of a May 17, 2023 memorandum from Governor Greg Gianforte to Kevin Gilbertson, Chief Information Officer of the State of Montana, re: “Expanding TikTok prohibition to all social media applications that provide personal information or data to foreign adversaries” The memorandum is available at https://governor.mt.gov/_docs/MEMO_221216_Banning_TikTok_on_State_Devices.pdf (last accessed July 5, 2023).

7. Attached as Exhibit F is a true and correct copy of an article titled “Montana AG Knudsen to Newsmax: State TikTok Ban First of Its Kind,” which was written by Fran Beyer and published by *Newsmax* on April 17, 2023. The article is available at <https://www.newsmax.com/newsmax-tv/tiktok-montana-ban/2023/04/17/id/1116448/> (last accessed July 5, 2023).

8. Attached as Exhibit G is a true and correct copy of a press release issued by the Montana Governor’s Office on May 17, 2023, titled “Governor Gianforte Bans TikTok in Montana.” The press release is available at https://news.mt.gov/Governors-Office/Governor_Gianforte_Bans_TikTok_in_Montana (last accessed July 5, 2023).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of July, 2023.



Rob Cameron